

RETURN DATE: SEPTEMBER 27, 2016 : SUPERIOR COURT

PHILIP ROSS : JUDICIAL DISTRICT OF LITCHFIELD  
226 BAKER ROAD  
ROXBURY, CT 06783

VS. : AT LITCHFIELD

GAILA M. ROSSITER :  
208 BAKER ROAD  
ROXBURY, CT 06783

and

STATE OF CONNECTICUT  
c/o GEORGE JEPSEN, ATTORNEY  
GENERAL  
55 ELM STREET  
HARTFORD, CT 06106

: AUGUST 12, 2016

### COMPLAINT

1. The Plaintiff is the owner of property located at 226 Baker Road, Roxbury, Connecticut.
2. The Defendant Gaila M. Rossiter is the owner of property located at 208 Baker Road, Roxbury, Connecticut.
3. The two properties are adjacent to each other.
4. For more than 15 years prior to the date of this Complaint, the Plaintiff has constructed and/or maintained certain structures, including a portion of his residence and a portion of the bilco door leading to the basement that are located within the boundary of the Defendant's property.
5. For more than 15 years prior to the date of this Complaint, the Plaintiff has drawn water from a well located on the Defendant's property; said well being the sole source of water for his residence.

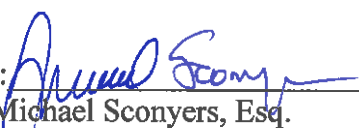
6. Such use and possession by the Defendant has at all times been:

- a. open;
- b. visible;
- c. notorious;
- d. adverse;
- e. exclusive;
- f. continuous;
- g. uninterrupted; and
- h. under claim of right.

7. The Defendant State of Connecticut may claim an interest in the property identified in Paragraph 2 by virtue of a Quit Claim Deed from The New York, New Haven and Hartford Railroad Company to the State of Connecticut dated May 26, 1949 and recorded in Volume 26, Page 258 of the Roxbury Land Records.

8. By virtue of the foregoing and the provisions of Conn. Gen. Stat. 52-575, Philip Ross has acquired sole and exclusive title to that portion of Defendant's property so occupied by him.

PLAINTIFF,  
PHILIP ROSS

By:   
J. Michael Sconyers, Esq.  
Ackerly Brown LLP  
Her Attorneys

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**STATEMENT OF RELIEF REQUESTED / AMOUNT IN DEMAND**

The statement of amount in demand/amount in issue is greater than \$15,000.00, and includes a claim for equitable relief in addition or lieu of monetary damages.

WHEREFORE, the Plaintiff claims:

1. A judgment settling title to the property in issue in Plaintiff;
2. An order barring the Defendants from interfering with Plaintiff's use of the property;
3. Such other, further relief in law or equity as the Court deems just and equitable under the circumstances.

PLAINTIFF, PHILIP ROSS

By:   
J. Michael Sconyers, Esq.  
Ackerly Brown LLP  
His Attorneys

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